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Docket Management System
U.S. Department of Transportation
Room Plaza 401 400 Seventh Street, S.W.
Washington, D.C. 20590-0001

Sent via Internet <http://dms.dot.gov>

REF: Docket No. FAA-2003-14449; Notice of Proposed Rulemaking (NPRM);
No. 03-03
Enhanced Flight Vision Systems

To Whom It May Concern:

The Aircraft Owners and Pilots Association (AOPA), representing the interests of over 390,000 pilots and aircraft owners, submits the following comments for the Federal Aviation Administration (FAA) rulemaking contained in Docket No. FAA-2003-14449:

AOPA recognizes the significant benefits that Enhanced Flight Vision Systems (EFVS) afford aircraft operations in reduced visibility conditions. AOPA agrees that no additional training for the use of EFVS should be required under Federal Aviation Regulations Part 61 (14 CFR §61) for general aviation pilots operating solely under 14 CFR §91. However, AOPA believes that §91.175 (1)(2) should not apply to operations conducted solely under 14 CFR §91. Continued descent below the published DA, DH or MDA should be allowed regardless of the visibility requirements prescribed in the approach instrument procedure being used, provided the pilot is able to maintain the appropriate visual contact with the required visual references using EFVS. AOPA believes that allowing the use of EFVS in this manner will provide a substantial operational benefit without adversely affecting safety.

In addition, AOPA asks that the FAA begin to identify the enabling benefits of lower-cost computer-generated Synthetic Vision Systems (SVS) for use in smaller general aviation airplanes, and to ensure that SVS operational capabilities occur in concert with the development of SVS equipment.

Sincerely,

Melissa K. Bailey
Vice President
Air Traffic, Regulatory & Certification Policy